

Significant Legislative Rule Analysis
WAC 246-933-460 - Courses approved by the veterinary board.
September 23, 2013

Section 1. What is the scope of the rule?

Veterinarians who practice in Washington State are required to take continuing veterinary medical education (CVME). Based on requests made during a rules workshop, the Veterinary Board of Governors (Board) considered and elected to propose to expand its list of organizations that are pre-approved to offer CVME credits. In addition, the proposed rule also states the Board may approve CVME credits for courses offered by entities and individuals not listed in WAC 246-933-460.

Section 2. What are the general goals and specific objectives of the proposed rule's authorizing statute?

The intent of chapter 18.92 RCW is to assure that providers of veterinary medicine, surgery and dentistry meet minimum standards of competency and professionalism.

RCW 18.92.030(2)(b) authorizes the Board to adopt rules necessary to carry out the purposes of chapter 18.92 RCW, including fixing minimum standards of continuing veterinary medical education.

Section 3. What is the justification for the proposed rule package?

The proposed rule was developed in response to a petition to the Board on March 4, 2010, requesting the amendment of WAC 246-933-460 so that Board pre-approval would not be required for courses sponsored by local chapters of the Washington State Veterinary Medical Association where the speaker is either board certified or a member of the faculty of a college of veterinary medicine. In response, the Board agreed to consider the petition because board certification is the highest certified level of expertise nationally and a member of the faculty of an accredited college of veterinary medicine is typically the individual who creates the content of a course.

The amendments are needed because it now allows licensees more options to obtain CVME credits without the need for licensees or course presenters to submit course materials to the Board for review and approval. The proposed rule also provides an opportunity for those providers who do not have "pre-approval" to submit coursework to the board for consideration.

Collectively, these changes will make it easier for providers to be able to meet the minimum standards of competency from having a greater pool of CVME courses.

Section 4. What are the costs and benefits of each rule included in the rules package? What is the total probable cost and total probable benefit of the rule package?

The amendment to WAC 246-933-460 does not add any cost to comply with the existing continuing education rules for veterinarians. The rule adds the following entities to the list of pre-approved providers: 1) board-certified veterinarians whose certification are issued by a veterinary specialty board recognized by the American Veterinary Medical Association; (2) a veterinarian who is a member of the faculty of an accredited college or school of veterinary medicine; (3) the United States Animal Health Association; (4) the American Association of Veterinary Laboratory Diagnosticians; and (5) the Washington state Department of Agriculture. A licensee may still choose to take a course from an organization or presented by an individual that does not appear on the approved list. If the organization is not currently approved, the licensee may request that the individual course be considered for approval.

The benefit of an approved organization is that the licensee knows in advance that the course is approved and can register and take the course without first seeking approval. As a result, listed individual and organization or licensees do not have to submit course materials to the board for review, saving each entity time and money.

The rule increases education opportunities for veterinarians by increasing the number of approved providers and allowing other providers an opportunity to get a specific course approved.

The proposed rule would not impose additional costs to comply, since the board does not require licensees to use specified CVME providers, and may lower costs by increasing available CVME options.

There are no costs to comply with this amendment.

Section 5. What alternative versions of the rule did we consider? Is the proposed rule the least burdensome approach?

The board considered how best to increase access to high quality educational opportunities with the goal of increasing providers' minimum standards of competency and elected to expand the list of approved providers. The board determined that the rule amendment is less burdensome because it allows the licensees more choices of approved providers of CVME and a listed organization or licensee does not have to submit course materials to the board for review, saving each entity time and money.

Section 6. Does the rule require anyone to take an action that violates another federal or state law?

The rule does not require those to whom it applies to take an action that violates requirements of federal or state law.

Section 7. Does the rule impose more stringent performance requirements on private entities than on public entities? If so, is this difference required in federal or state law?

Any proposed performance requirements would apply equally to individuals that are licensed under chapter 18.93 RCW both in private or public entities.

Section 8. Does the rule differ from any federal regulation or statute applicable to the same activity or subject matter and, if so, did we determine that the difference is justified by an explicit state statute or by substantial evidence that the difference is necessary?

The rule does not differ from any applicable federal regulation or statute.

Section 9. Has the rule been coordinated, to the maximum extent possible, with other federal, state, and local laws applicable to the same activity or subject matter?

There are no other applicable laws.